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November 2, 2022

The Hon. James B Clark, III
Magistrate Judge, United States District Court
Newark, New Jersey 07102
Via efilng

Re: Live Universe, Inc. v Rene Muijres, et. al., Civil Action No. 2:22-04918
ES-JBC

Dear Judge Clark:

I represent plaintiff and write respectfully to request an adjournment of the defendants' motion to dismiss returnable November 21, 2022 with opposition due November 7, filed by 4 of the 11 defendants in this case (Viralhog, LLC, KMMT, LLC, Brent Maggio, and Ryan Bartholomew) (Docket # 7).

Two prior extensions have been granted. The motion itself is complex involving multiple parties and issues, jurisdiction and substantive arguments, with the moving package comprising more than 350 pages.

I am new counsel, this matter is complex and somewhat technical beyond being detailed. Our office has been working with the client, outside counsel and others to prepare our opposition. However, added time is needed to adequately present our position.

Per Letter Order in Docket # 25, any defendants already served and/or appearing in this action are required to respond to the Complaint by November 16. Given that these defendants may file a motion to dismiss by that date, in the interests of judicial efficiency, plaintiff respectfully requests a revised briefing schedule so that plaintiff may file single opposition to the defendants' motion in Docket #7 as well as any additional motions to dismiss that may be filed by November 16. This way, the Court may also deal with all motions by the defendants together.

Respectfully yours,

Howard Gutman

Howard A. Gutman

cc: all counsel